

1 RANDALL S. NEWMAN (SBN 190547)

2 Attorney at Law

3 99 Wall St., Suite 3727

4 New York, NY 10005

5 212.797.3735

6 rsn@randallnewman.net

7 *Attorney for Petitioner,*

8 *Christopher J. Cordova*

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11
12 IN RE: DMCA SECTION 512(h)
13 SUBPOENA TO GOOGLE, LLC
14 D/B/A YOUTUBE

Case No. 5:25-mc-80192

15 **CHRISTOPHER J. CORDOVA'S**
16 **REQUEST TO THE CLERK FOR**
17 **ISSUANCE OF SUBPOENA TO**
18 **GOOGLE, LLC D/B/A YOUTUBE**
19 **PURSUANT TO 17 U.S.C. § 512(h), TO**
20 **IDENTIFY ALLEGED INFRINGER**

Christopher J. Cordova (“Petitioner”), through his undersigned counsel of record, hereby requests that the Clerk of this Court issue a subpoena to Google, LLC d/b/a YouTube (“YouTube”) to identify an alleged infringer or infringers, pursuant to the Digital Millennium Copyright Act (“DMCA”), 17 U.S.C. § 512(h) (the “DMCA Subpoena”). The proposed DMCA Subpoena is attached hereto as Exhibit A.

The DMCA Subpoena is directed to service provider YouTube. YouTube operates a website to which the infringing party or parties (identified by their YouTube channel as <https://www.youtube.com/@drdaveprofessor>) posted videos using Petitioner’s audio-visual footage, which postings infringe on the copyrights held by Petitioner in those materials (the “Infringing Video”). *See* Declaration of Christopher J. Cordova (“Cordova Decl.”) ¶ 2).

Petitioner has satisfied the requirements for issuance of a subpoena pursuant to 17 U.S.C. § 512(h), namely:

1. Petitioner has submitted a copy of the DMCA notification required by 17 U.S.C. § 512(c)(3)(A) as Exhibit 1 to the Cordova Decl., filed concurrently herewith.
2. Petitioner has submitted the proposed DMCA Subpoena concurrently herewith; and
3. Petitioner has submitted a sworn declaration confirming that the purpose for which the DMCA Subpoena is sought is to obtain the identity of an alleged infringer or infringers, and that such information will only be used for the purpose of protecting Petitioner’s rights under 17 U.S.C. § 512(h)(2).

Accordingly, in support of its request for a DMCA Subpoena, Petitioner submits and attaches:

- A copy of the DMCA notification described in 17 U.S.C. § 512(c)(3)(A). *See* Cordova Decl. Ex. 1);
- A proposed DMCA Subpoena directed to the service provider, YouTube (Ex. A hereto); and

- A sworn declaration that the purpose for which the DMCA Subpoena is sought is proper under the DMCA. (*See* Cordova Decl., ¶ 4).

Because Petitioner has complied with the statutory requirements, Petitioner respectfully requests that the Clerk expeditiously issue and sign the proposed DMCA Subpoena pursuant to 17 U.S.C. § 512(h)(4) and return it to undersigned counsel for service on the subpoena recipient.

Dated: July 12, 2025

/s/ Randall S. Newman
Randall S. Newman, Esq. (SBN 190547)
99 Wall Street, Suite 3727
New York, NY 10005
(212) 797-3735
rsn@randallnewman.net

*Attorney for Petitioner,
Christopher J. Cordova*

EXHIBIT A

UNITED STATES DISTRICT COURT

for the

Northern District of California

Plaintiff

v.

IN RE: DMCA SECTION 512(h)

SUBPOENA TO GOOGLE, LLC D/B/A YOUTUBE

Defendant

Civil Action No. 5:25-mc-80192

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTIONTo: GOOGLE, LLC D/B/A YOUTUBE
C/O CORPORATION SERVICE CO., 2710 GATEWAY OAKS DR., SUITE 150N, SACRAMENTO, CA 95833

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

SEE ATTACHMENT A

Place: VIA EMAIL ONLY: RSN@RANDALLNEWMAN.NET

Date and Time:

08/08/2025 5:00 pm

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: _____

CLERK OF COURT

OR

Signature of Clerk or Deputy Clerk_____
Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party) _____

Christopher J. Cordova, who issues or requests this subpoena, are:

Randall S. Newman, 99 Wall St, Ste. 3727, New York, NY 10005, rsn@randallnewman.net

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

ATTACHMENT A

DOCUMENTS TO BE PRODUCED UNDER SUBPOENA

1. All identifying information, including the name(s), address(es), telephone number(s), email address(es), and IP address(es) for the user(s) associated with the following YouTube channel: **<https://www.youtube.com/@drdaveprofessor>**. Please include all identifying information provided when this channel was established, as well as all identifying information provided subsequently for billing, administrative or AdSense revenue purposes.

2. All identifying information, including the name(s), address(es), telephone number(s), email address(es), social media profile data, and IP address(es), for the users who posted, uploaded, downloaded or modified the data at the following URL: **<https://www.youtube.com/watch?v=0hrKR-9yZhU>**.

3. All identifying information, including the name(s), address(es), telephone number(s), email address(es), social media profile data, and IP address(es), for the users who posted, uploaded, downloaded or modified the data at the following URL: **<https://www.youtube.com/watch?v=35g6vyQXX2s>**.

4. All identifying information, including the name(s), address(es), telephone number(s), email address(es), social media profile data, and IP address(es), for the users who posted, uploaded, downloaded or modified the data at the following URL: **<https://www.youtube.com/watch?v=5Q7vOXucHJw>**.

5. All identifying information, including the name(s), address(es), telephone number(s), email address(es), social media profile data, and IP address(es), for the users who posted, uploaded, downloaded or modified the data at the following URL: **<https://www.youtube.com/watch?v=hPBI-0gtNRg>**.

6. All identifying information, including the name(s), address(es), telephone number(s), email address(es), social media profile data, and IP address(es), for the users who posted, uploaded, downloaded or modified the data at the following URL: **<https://www.youtube.com/watch?v=izLHm3p2mrE>**.

1 7. All identifying information, including the name(s), address(es), telephone
2 number(s), email address(es), social media profile data, and IP address(es), for the users
3 who posted, uploaded, downloaded or modified the data at the following URL:
4 **<https://www.youtube.com/watch?v=jFXYB28p9go>.**

5 8. All identifying information, including the name(s), address(es), telephone
6 number(s), email address(es), social media profile data, and IP address(es), for the users
7 who posted, uploaded, downloaded or modified the data at the following URL:
8 **<https://www.youtube.com/watch?v=mmHT8HWedJ4>.**

9 9. All identifying information, including the name(s), address(es), telephone
10 number(s), email address(es), social media profile data, and IP address(es), for the users
11 who posted, uploaded, downloaded or modified the data at the following URL:
12 **<https://www.youtube.com/watch?v=rB0QEICJsqli>.**

13 10. All identifying information, including the name(s), address(es), telephone
14 number(s), email address(es), social media profile data, and IP address(es), for the users
15 who posted, uploaded, downloaded or modified the data at the following URL:
16 **<https://www.youtube.com/watch?v=u8s3hR8EpL8>.**

17 11. All identifying information, including the name(s), address(es), telephone
18 number(s), email address(es), social media profile data, and IP address(es), for the users
19 who posted, uploaded, downloaded or modified the data at the following
20 URL: **<https://www.youtube.com/watch?v=v8BxJTGSBpo>.**